

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

ZJBV Properties, LLC,)
)
)
Plaintiff,) Civil No. 1:21-cv-01070-JL
)
)
v.)
)
Mammoth Tech, Inc.,)
)
Defendant.)
)
)
)

JOINT STATEMENT ON THE STATUS OF DISCOVERY

NOW COMES the Plaintiff, ZJBV Properties, LLC (“ZJBV”), together with the Defendant, Mammoth Tech, Inc. (“Mammoth Tech”), and hereby file a Joint Statement on the Status of Discovery as follows:

1. On or around April 5, 2022, ZJBV propounded its First Set of Interrogatories and First Request for Production of Documents on the Defendant, Mammoth Tech, Inc. (“Mammoth Tech”).
2. On or around May 18, 2022, Mammoth Tech’s counsel filed an Assented-to Motion to Withdraw, which was granted on May 24, 2022. [Dock. No. 15.]
3. On or around June 3, 2022, ZJBV filed a Motion for Default against Mammoth Tech for its failure to answer the written discovery requests. [Dock. No. 17.]
4. On or around June 28, 2022, the Court entered an Endorsed Order, in which it set July 12, 2022 as the deadline for Mammoth Tech to file an Objection to the Motion for Default.

5. On or around July 11, 2022, Mammoth Tech's former counsel entered an Appearance in the above-captioned matter and filed an Objection to the Motion for Default. [Dock. Nos. 18, 19.]

6. On or around July 12, 2022, the Court granted Mammoth Tech's Objection to the Motion for Default and set Mammoth Tech's deadline to file a response to ZJBV's First Set of Interrogatories as August 2, 2022.

7. At this time, ZJBV awaits interrogatory responses from Mammoth Tech, which Mammoth Tech has stated will be provided on August 2, 2022.

8. The current discovery deadline is set for August 15, 2022. However, the Parties have discussed extending the discovery deadline to allow the Parties an opportunity to conduct meaningful discovery.

9. Accordingly, the Parties intend to prepare and file a Motion to Extend Case Deadlines, which will extend the mediation, discovery, and trial deadlines in the above-captioned matter.

Dated: July 28, 2022

/s/ Hilary Holmes Rheaume, Esq.
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Counsel for Defendant

CERTIFICATE OF SERVICE

I certify that on this 28th day of July, 2022, I provided a true and exact copy of the foregoing to all counsel of record.

/s/ Hilary Holmes Rheaume, Esq.
Hilary Holmes Rheaume, Esq.